

**RICHARD SEELEY,**  
**Plaintiff**

DAVID BILLS

**SUPERIOR COURT**

**J.D. OF NEW HAVEN**

## AT NEW HAVEN

**April 13, 2017**

#### **FOURTH SPECIAL DEFENSE- COUNTS FIVE THROUGH EIGHT**

Plaintiff denies the allegations contained in Defendant's Fourth Special Defense as to Counts Five through Eight.

#### **FIFTH SPECIAL DEFENSE- COUNTS FIVE THROUGH EIGHT**

Plaintiff denies the allegations contained in Defendant's Fifth Special Defense as to Counts Five through Eight.

#### **SIXTH SPECIAL DEFENSE- COUNTS FIVE THROUGH EIGHT**

Plaintiff denies the allegations contained in Defendant's Sixth Special Defense as to Counts Five through Eight.

#### **ADDITIONAL DEFENSES- COUNTS FIVE THROUGH EIGHT**

Plaintiff objects to Defendant's right to assert additional special defenses beyond those asserted in its Answer and Special Defenses. Notwithstanding the objection, Plaintiff reserves the right to reply to any additional special defenses Defendant asserts.

Respectfully submitted,

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**Plaintiff's Attorneys**

### CERTIFICATION

I certify that a copy of the above was or will immediately be mailed or delivered electronically or non-electronically on April 13, 2017 to all counsel and self-represented parties of record and that written consent for electronic delivery was received from all counsel and self-represented parties of record who were or will immediately be electronically served:

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/s/ Maria Garcia-Quintner  
Maria Garcia-Quintner